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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

3:23-cv-00453-MO

Plaintiff,

v.

**NOTICE OF COMPLAINT FOR
FORFEITURE AGAINST REAL
PROPERTY**

**\$396,172.61 IN U.S. CURRENCY
FROM FOUR (4) JP MORGAN
CHASE BANK ACCOUNTS;**

**ALL FUNDS CONTAINED WITHIN
SIX (6) CHARLES SCHWAB
BROKERAGE ACCOUNTS;**

**ONE 2022 TESLA MODEL Y, VIN
7SAYGDEE3NF315820, ITS TOOLS
AND APPURTENANCES; and**

**FIVE (5) REAL PROPERTIES WITH
BUILDINGS, APPURTENANCES,
AND IMPROVEMENTS, *in rem*,**

Defendants.

TO: Nicole Randall; Nicole Randall as Trustee of the Randall Family Living Trust; Lone Star Homes, LLC, c/o Registered Agent: Registered Agents Inc.; Any and All Occupants of 141 Brady Creek Way, Leander, Texas; Any and All Occupants of 1028 Arvada Drive, Leander,

Notice of Complaint

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Texas; Any and All Occupants of 910 Alamo Plaza Drive, Cedar Park, Texas; Any and All Occupants of 3405 Rain Forest Drive, Austin, Texas; Any and All Occupants of 3927 Castleman Avenue, St. Louis, Missouri; E3D, LLC; Mortgage Electronic Registration Systems, Inc.; Williamson County Recorder's Office, Texas; Travis County Recorder's Office, Texas; St. Louis City County Recorder's Office.

A civil complaint seeking forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), was filed on March 29, 2023, in the United States District Court for the District of Oregon by Assistant United States Attorney Katherine De Villiers, on behalf of the United States of America, plaintiff, against the defendant real properties, *in rem*, Five Real Properties, more fully described as:

Defendant Real Property 1: 141 Brady Creek Way, Leander, Texas

(R589491)

Lot 31, Block D, of CAUGHFIELD, PHASE 9, a subdivision in Williamson County, Texas according to the map or plat thereof, recorded in Document Number 2019119008, of the Official Public Records of Williamson County, Texas.

Defendant Real Property 2: 1028 Arvada Drive, Leander, Texas

(Parcel Number R528882)

Lot 16, Block G, SAVANNA RANCH, SECTION TWO FINAL PLAT, a subdivision in Williamson County, Texas, according to the map or plat recorded in Document No. 2014050918, of the Official Public Records of Williamson County, Texas.

Defendant Real Property 3: 910 Alamo Plaza Drive, Cedar Park, Texas

(Parcel Number R506041)

Lot 1; Block 60, Cedar Park Towncenter, Section VIII, an addition in Williamson County, Texas, According to the map or plat recorded in Cabinet GG, Slide S161-165, Plat Records, Williamson County, Texas.

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Defendant Real Property 4: 3405 Rain Forest Drive, Austin, Texas

(Parcel Number: 106079)

Lot 2, Block E, Woodhaven, according to the map or plat thereof, recorded in Volume 76, Page 132, Plat Records, Travis County, Texas.

Defendant Real Property 5: 3927 Castleman Avenue, St. Louis, Missouri

(Parcel Number 49440002500)

The Eastern 33 feet 4 inches of Lot No. 23 in Block No. 17 of TYLER PLACE and in Block No. 4944 of the City of St. Louis, fronting 33 feet 4 inches on the North line of Castleman Avenue, by a depth Northwardly of 121.89 feet.

The complaint alleges that said properties may, for the causes stated in the complaint, be forfeited to the United States.

All persons claiming an interest in or right against the defendant real properties may contest the forfeiture by filing a claim in the manner set forth in Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal Rules of Civil Procedure. The claim must be filed not later than the time stated in a direct notice sent under Rule G(4)(b), or 30 days after the final publication of notice if no direct notice was sent to claimant or claimant's attorney. In addition, any person having filed such a claim shall also serve and file an answer to the complaint under Rule G (5)(b) within 21 days after the filing of the claim. The claim must be filed with the Clerk of the United States District Court for the District of Oregon, 1000 SW 3rd Avenue, Room 740, Portland, OR 97204. The claim and answer must be served upon Katherine C. De Villiers, Assistant United States Attorney, 1000 SW 3rd Ave., Suite 600, Portland, OR 97204.

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In accordance with 18 U.S.C. § 985, this Notice shall be posted on the defendant properties and this Notice shall be served on the property owner(s), along with a copy of the Complaint for Forfeiture.

DATED: **April 3, 2023**

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Katherine C. De Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney